

## REMARKS

Claims 1, 6-8, 11 and 14-18 have been amended. Claim 19 has been added. Claims 1-19 are currently pending. Claims 1, 11, 17 and 18 are independent claims. Reconsideration of the present application is requested.

### I. INFORMATION DISCLOSURE STATEMENT

Applicants appreciate and acknowledge the Examiner's careful consideration of the references cited in the Information Disclosure Statement filed November 3, 2005.

### II. REJECTION UNDER 35 U.S.C. § 102(B)

The Examiner rejects claims 1, 2, 11, 17 and 18 as allegedly being anticipated by Tomizawa et al. (U.S. Patent Publication No. 2002/0180883, hereinafter "Tomizawa") under 35 U.S.C. § 102(b). This rejection is respectfully traversed.

On page 10 of the Office Action, the Examiner correctly recognizes that Tomizawa fails to teach or suggest "**adjusting strength of modulation in said modulating step based on a result of comparison between video signals of the current field and video signals of an earlier of previous two fields,**" as previously recited in claim 6 and now set forth in claim 1. Claims 11, 17 and 18 have also been amended in a similar manner. For at least this reason, claims 1, 11, 17 and 18 are distinguishable over Tomizawa.

Claim 2 is also distinguishable over Tomizawa at least by virtue of its dependency from claim 1.

### **III. REJECTION UNDER 35 U.S.C. § 103(A)**

The Examiner rejects claims 6, 7, 8, 15 and 16 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tomizawa in view of Nakanishi and further in view of Mizumaki (U.S. Patent No. 6,333,727). Because claims 1, 11, 17 and 18 have been amended to include limitations somewhat similar to those previously set forth in claim 6, for example, Applicants address this rejection with respect to amended claims 1, 11, 17 and 18.

**A. THE COMBINATION OF TOMIZAWA, NAKANISHI AND MIZUMAKI FAILS TO TEACH ALL FEATURES OF CLAIMS 1, 11, 17 AND 18 AS NOW AMENDED BECAUSE THE COMBINATION FAILS TO TEACH AT LEAST "ADJUSTING STRENGTH OF MODULATION IN SAID MODULATING STEP BASED ON A RESULT OF COMPARISON BETWEEN VIDEO SIGNALS OF THE CURRENT FIELD AND VIDEO SIGNALS OF AN EARLIER OF PREVIOUS TWO FIELDS," AS RECITED IN CLAIM 1.**

On page 10 of the outstanding Office Action, the Examiner correctly acknowledges that Tomizawa fails to teach or suggest "**adjusting strength of modulation in said modulating step based on a result of comparison between video signals of the current field and video signals of an earlier of previous two fields,**" as previously set forth in claim 6 and now set forth in claim 1. The Examiner relies upon Mizumaki to allegedly teach this feature. In particular, the Examiner relies upon col. 8, ll. 26-37 of Mizumaki, which discuss an operation of the second memory 4. However, the cited portion of Mizumaki fails to teach any such adjusting of modulation strength as required by claim 1.

On the one hand, in at least one example embodiment of the present invention, a modulation-driving and processing section 21b of FIG. 9, for example, may compare video data for the same pixel between a current field and a previous field. If the video data are substantially the same, the modulation-driving processing section 21b may reduce the level of facilitation (strength of modulation) when driving the pixels PIX. The method of claim 1, in particular, requires that the strength of the modulation is adjusted by referring to a comparison between the current field and video signals of an earlier of two previous fields.

On the other hand, Mizumaki compares pixel data of each pixel of a current frame with pixel data of the same pixel for a next frame. If the difference in gray scale levels of pixel data output from the second memory 4 and of the next frame is less than a threshold value, **the pixel data stored in the second memory 4 is not updated.** Mizumaki, col. 8, ll. 24-32. That is, Mizumaki stores or does not store pixel data based on a comparison. Mizumaki, however, does not adjust any strength of modulation. Therefore, Mizumaki clearly fails to teach the "**adjusting**," required by claim 1.

Moreover, the Examiner appears to allege that the maintaining of a previous grey scale level in a pixel if the difference between the current and the previous values is below a certain threshold (as set forth in Mizumaki) allegedly corresponds to the modulation of claim 1. However, Mizumaki only compares a present field and a previous field. Mizumaki does not compare video signals of

a "**current field and video signals of an earlier of previous two fields,**" as set forth in claim 1.

Nakanishi also fails to teach or suggest the above features. Therefore, even assuming *arguendo* that Tomizawa, Nakanishi and/or Mizumaki could be combined (which Applicant does not admit); **the combination still fails to teach all features now set forth in claim 1.** For at least this reason, claim 1 is distinguishable over the Examiner's alleged combination of Tomizawa, Nakanishi, and Mizumaki.

Claims 11, 17 and 18 are also distinguishable over the alleged combination of Tomizawa, Nakanishi and Mizumaki for at least reasons somewhat similar to those set forth above regarding claim 1. Claims 7, 8, 15 and 16 are distinguishable over the Examiner's combination at least by virtue of their dependency from claim 1.

**B. THE COMBINATION OF TOMIZAWA, NAKANISHI AND MIZUMAKI FAILS TO TEACH ALL FEATURES OF CLAIMS 8 BECAUSE THE COMBINATION FAILS TO GRADUALLY REDUCE THE STRENGTH OF MODULATION.**

Claim 8 further recites that the strength of modulation is gradually reduced from a full strength to zero strength according to a difference between the video signals of the current field and the video signals of the earlier of the previous two fields, if the difference falls within a predetermined range. The Examiner alleges that the features of claim 8 are taught by Mizumaki. However, Mizumaki merely teaches not updating image data if the four most significant bits of old and new data are the same. In other words, the old data

is not updated if the old and new data differ only in the two least significant bits. Mizumaki, col. 7, ll. 23 – col. 8, ll. 61.

Therefore, even assuming *arguendo* that the Examiner's alleged modulation in Mizumaki could be considered modulation (which Applicants do not admit, and disagree with for at least the above reasons), Mizumaki teaches discontinuous modulation, where the data is fixed for small differences, and changes normally for large differences (full modulation or zero modulation). Mizumaki does not teach or suggest gradually reducing the strength of modulation. Therefore, claim 8 distinguishes over the combination of Tomizawa, Nakanishi and/or Mizumaki.

Withdrawal of this rejection is kindly requested.

#### **IV. FURTHER REJECTIONS UNDER 35 U.S.C. § 103(A)**

The Examiner further rejects **claims 12 and 13** under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tomizawa and Nakanishi (U.S. Patent No. 5,488,389); **claims 3, 4 and 5** under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tomizawa and Huang (U.S. Patent No. 6,295,091); **claims 9 and 10** over Tomizawa and Gadeyne et al. (U.S. Patent No. 6,909,472, hereinafter referred to as "Gadeyne"); and **claim 14** under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tomizawa and Choquet et al. (U.S. Patent No. 4,937,667, hereinafter referred to as "Choquet"). Each of these rejections is respectfully traversed in that none of the above references teaches nor suggests, "**adjusting strength of modulation in said modulating step based on a result of comparison between video signals of the current field and**

**video signals of an earlier of previous two fields,"** as previously set forth in claim 6 and now set forth in claim 1.

For at least this reason, claims 3-5, 9-10 and 12-14 are in condition for allowance.

#### **V. NEW CLAIM 19**

The Examiner relies upon Mizumaki to teach adjusting the strength of modulation as set forth in claim 1. However, Mizumaki fails to teach any overdrive modulation. Moreover, Mizumaki also fails to apply the alleged modulation to facilitate gray scale transitions. Therefore, claim 19 is also allowable over Tomizawa, Nakanishi and/or Mizumaki.

#### **VI. CONCLUSION**

In view of above remarks, reconsideration of the outstanding rejection and allowance of the pending claims is respectfully requested.

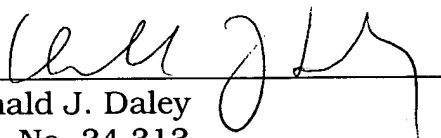
If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone Andrew M. Waxman, Reg. No. 56,007, at the number of the undersigned listed below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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